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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
MICHELE FIORE,  
Defendant.

Case No. 2:24-cr-00155-JAD-DJA

**STIPULATION RE: AUTHENTICITY  
OF CERTAIN EXHIBITS**

The government, by the undersigned attorneys for the U.S. Department of Justice, Criminal Division, and the defendant, along with her undersigned attorney, hereby and agree as follows:

### **Stipulations Regarding Authenticity and Business Records**

The exhibits identified below for Stipulation numbers 1 through 16, whether in their entirety, or excerpts taken from those documents, are (1) authentic and do not require additional

1 foundational testimony from a records custodian or other pertinent authentication witness and  
 2 (2) constitute records of regularly conducted activity under Federal Rules of Evidence 803 (6) and  
 3 are non-hearsay. Both the government and the defense reserve the right to challenge the  
 4 admissibility of the evidence on any other grounds.

STIP NO.	Exhibits Covered:	Description of Evidence	BegDoc Range
1	1, 2, 3, 3A, 4, 5, 42, 43, 44, 62, 70, 91, 92, 93	Records contained in Grand Jury Subpoena #02 to Bank of Nevada (covered by Certificate of Authenticity found at DOJ-0000022217)	DOJ-0000022217 to DOJ-0000022938
2	6, 6A, 6B	Records contained in Grand Jury Subpoena #07 to Western Alliance Bank	DOJ-0000009565 to DOJ-0000009597
3	1, 1A, 1B, 2, 2A, 3, 3A, 41, 46, 47, 48, 51, 52, 53, 55, 56, 57, 63, 66, 68, 69, 71, 72, 86, 87, 88, 89, 96, 97, 98, 99	Records contained in Grand Jury Subpoena #08 to Western Alliance Bank (covered by Certificate of Authenticity found at DOJ-0000022214)	DOJ-0000022080 to DOJ-0000022214
4	3, 5	Records contained in Grand Jury Subpoena #27 to Western Alliance Bank (covered by Certificate of Authenticity found at DOJ-0000088657)	DOJ-0000025420 to DOJ-0000025846
5	1, 2, 3, 4, 5, 6	Records contained in Grand Jury Subpoena #32 to Western Alliance Bank (covered by Certificate of Authenticity found at DOJ-0000025953)	DOJ-0000025849 to DOJ-0000026230
6	1, 2, 3, 4, 5	Records contained in Grand Jury Subpoena #56 to Western Alliance Bank (covered by Certificate of Authenticity found at DOJ-0000033014)	DOJ-0000033005 to DOJ-0000033164
7	1, 2, 3, 4, 5	Records contained in Grand Jury Subpoena #83 to Western Alliance Bank (covered by Certificate of Authenticity found at DOJ-0000088667)	DOJ-0000064099 to DOJ-0000064280
8	8, 8A	Records contained in Grand Jury Subpoena #17 to Wells Fargo (covered by Certificate of Authenticity found at DOJ-0000010867)	DOJ-0000010350 to DOJ-0000012669
9	9	Records contained in Grand Jury Subpoena #78 to Bank of America	DOJ-0000009692 to DOJ-0000010347
10	31	Secretary of State records regarding Future for Nevadans	DOJ-0000088668 to DOJ-0000088678

STIP NO.	Exhibits Covered:	Description of Evidence	BegDoc Range
11	36	Secretary of State records regarding Politically Off The Wall, LLC (covered by Certificate of Authenticity found at DOJ-0000024052)	DOJ-0000024052 to DOJ-0000024061
12	37	Secretary of State records regarding Truth In Politics, The Magazine, LLC (covered by Certificate of Authenticity found at DOJ-0000023802)	DOJ-0000023802 to DOJ-0000023811
13	32	Secretary of State records regarding A Bright Present Foundation (covered by Certificate of Authenticity found at DOJ-0000023779)	DOJ-0000023779 to DOJ-0000023788
14	38	Secretary of State records regarding Hamlet Events (covered by Certificate of Authenticity found at DOJ-0000024253)	DOJ-0000024253 to DOJ-0000024259
15	60	Secretary of State C&E filings for Fiore for Nevada (covered by Certificate of Authenticity found at DOJ-0000023721; DOJ-0000023759; DOJ-0000023818; DOJ-0000023862; DOJ-0000023874; DOJ-0000023912; DOJ-0000024019; DOJ-0000024066; DOJ-0000024085; DOJ-0000024110; DOJ-0000024128; DOJ-0000024158; DOJ-0000024261)	DOJ-0000023721 to DOJ-0000023757 DOJ-0000023759 to DOJ-0000023766 DOJ-0000023818 to DOJ-0000023826 DOJ-0000023862 to DOJ-0000023869 DOJ-0000023874 to DOJ-0000023881 DOJ-0000023912 to DOJ-0000023925 DOJ-0000024019 to DOJ-0000024036 DOJ-0000024066 to DOJ-0000024074 DOJ-0000024085 to DOJ-0000024099 DOJ-0000024110 to DOJ-0000024115 DOJ-0000024128 to DOJ-0000024137 DOJ-0000024158 to DOJ-0000024171 DOJ-0000024261 to DOJ-0000024268

STIP NO.	Exhibits Covered:	Description of Evidence	BegDoc Range
16	61	Secretary of State C&E filings for Future for Nevadans (covered by Certificate of Authenticity found at DOJ-0000023767; DOJ-0000023812; DOJ-0000023850; DOJ-0000024004; DOJ-0000024013; DOJ-0000024103; DOJ-0000024116; DOJ-0000024122; DOJ-0000024186; DOJ-0000024210; DOJ-0000024247	DOJ-0000023767 to DOJ-0000023778 DOJ-0000023812 to DOJ-0000023817 DOJ-0000023850 to DOJ-0000023855 DOJ-0000024004 to DOJ-0000024009 DOJ-0000024013 to DOJ-0000024018 DOJ-0000024103 to DOJ-0000024109 DOJ-0000024116 to DOJ-0000024121 DOJ-0000024122 to DOJ-0000024127 DOJ-0000024186 to DOJ-0000024192 DOJ-0000024210 to DOJ-0000024215 DOJ-0000024247 to DOJ-0000024251

DATED this 9th day of September, 2024.

COREY R. AMUNDSON  
Chief, Public Integrity Section  
U.S. Department of Justice

/s/ Michael Sanft \_\_\_\_\_  
Michael Sanft  
Counsel for Michele Fiore

/s/Dahoud A. Askar \_\_\_\_\_  
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